Message

From: Marlene Tyner-Valencourt [tyner-valencourt@wra-ca.com]
Sent: 9/15/2020 3:46:00 PM
To: Pankratz, Shannon L CIV USARMY CESPL (US) [Shannon.L.Pankratz@usace.army.mil]
CC: Tracey Brownfield [tracey@landveritas.com]; Scianni, Melissa [Scianni.Melissa@epa.gov]; Steinert, Tiffany@Waterboards [Tiffany.Steinert@waterboards.ca.gov]; Mahdavi, Sarvy [Mahdavi.Sarvy@epa.gov]; Zimmerman, Jan@Waterboards [jan.zimmerman@waterboards.ca.gov]; Nate Bello [bello@wra-ca.com]
Subject: Re: Petersen Ranch MB: IRT requests/questions (UNCLASSIFIED)
Attachments: All Agency Ledgers_2_4_2020 w Release E3_F.pdf

Hello Petersen IRT Members,

Hope everyone had a nice weekend! Thanks for your email, Shannon. I've added our responses, along with requests for clarification, in blue text below.

Credit Release Request Tables -- Shannon, would you like me to make these changes in the Area E Release 3 request letter that is on your desk now? Per your email from last week, it sounded like you were already reviewing it, but perhaps you have reviewed it and have these additional comments that should be addressed before you approve the request. FYI the request has been approved by EPA (7/29/2020) and CDFW (8/10/2020).
-Include Date of previous releases
-Add Phase
-Add cumulative number of credits released (now it only shows Cumulative % or released credits)
-Last column currently says Total XX Credits - Check terminology in the BEI for consistency- Total Possible or Total Potential Credits?

All Agencies Ledgers
-Explain why there is a column for 404, 1600, Water Board but a separate table and not a column for CEQA -- Within the All Agencies Ledgers files, there are two tables for each credit type - Credit Summary and the Credit Transaction Ledger. For example, the most recent one dated 7/9/2020 on RIBITS shows 404 pg 1-5, 1600 pg 6-9, CEQA pg 10-14, CESA pg 15-16, and PC pg 17-19. Within each Credit Transaction Table, there are three columns that record the permit numbers (404, 1600, RB) tied to each credit sale (we do not track CEQA SCH#s in the ledger) and then a separate column that shows the credit type being transferred and the associated transfer amount. In short, each credit type has their own set of tables showing credit availability, releases, and transfers. Please see below for a quick figure (Snip 1) that shows these column labels that are common to each Credit Transaction Table.

Credit sales and Credit release requests --
-Include in your cover letter the number of credits that are being deducted from each credit category with a detailed accounting of any credits that are deducted from multiple credit categories. Can the IRT please clarify if a cover letter should be prepared for all credit sales moving forward? We have not prepared a cover letter for credit sales in the past as we submit sale notifications on RIBITS, where we upload the sales agreement and an updated All Agency Ledger (per the below request, I will start sending notifications to all IRT members via email with these materials attached in addition to uploading everything to RIBITS).
At our upcoming meeting, we should discuss specifically what the IRT would like to see in terms of credit deductions from multiple credit categories. Petersen crediting is super complicated and we are happy to provide any and all information you need to understand and feel comfortable with how we are tracking everything!
-Provide all documents that have or will be been updated as a result of the credit sale or approval of credit release including the credit tables, ledgers and master spreadsheet.

We provide updated ledgers following every credit sale on RIBITS, which we are already doing as part of our credit transfer reporting. We also provide a ledger with each credit request letter; this latest request mistakenly did not include the Release E3 amounts with a TBD release date in the ledger; please find an updated version of this ledger file that now includes those amounts.

When you say "master spreadsheet", can you please clarify what you are looking for?

When you say "credit tables" can you please clarify what you are looking for? Each one of our ledgers includes a Credit Summary Table that presents the total credits released, transferred, and available with each transaction and release incorporated (please see Snip 2 below that shows an example of this) as well as a Credit Transaction Ledger that details each release and transfer for each credit type.

Coordination

-Schedule a meeting in coordination with IRT review of Annual Report to review/reconcile credit balances /accounting and annual report - The next annual report is due on November 15 and we have already met to discuss last year's report. I recommend we schedule a meeting to discuss crediting and the ledger within the next few weeks and schedule a follow-up meeting in December or January to review the incoming annual report. If that sounds agreeable to you all I will send out a Doodle to get everything scheduled.

-Please send all credit sale notifications to all IRT members as well as to RIBITS. I would be happy to email all IRT members individually with credit sales notifications as I have been with Janice, though perhaps the auto-notifications from RIBITS can be set up for everyone to ensure everyone is notified in a streamlined and efficient manner. Please advise - happy to help ensure this is working for everyone!

Snip 1: Credit Transaction Table headers for all credit types (404, 1600, CEQA, CESA, and PC)

Transaction Date	Transaction No	Transaction Type	Project Applicant	Project Name	Corps File No	CDFW File No	RWQCB File No	404 Credit	Transfer Amount

Transaction Date	Transaction No	Transaction Type	Project Applicant	Project Name	Corps File No	CDFW File No	RWQCB File No	1600 Credit	Transfer Amount

Transaction Date	Transaction No	Transaction Type	Project Applicant	Project Name	Corps File No	CDFW File No	RWQCB File No	CEQA Credit	Transfer Amount

Transaction Date	Transaction No	Transaction Type	Project Applicant	Project Name	Corps File No	CDFW File No	RWQCB File No	CESA Credit	Transfer Amount

Transaction Date	Transaction No	Transaction Type	Project Applicant	Project Name	Corps File No	CDFW File No	RWQCB File No	PC Credit	Transfer Amount

Key

Credit Transaction Table fields common to all credit types

Snip 2: Example credit summary table from All Agency Ledger report (for illustrative purposes)

404 Credit Summary

404 Credit	Total 404 Credits	404 Credits Released	404 Credits Transferred	404 Credits Available
Alluvial Floodplain	29.82	15.66	4.11	11.56
Alluvial Floodplain Riparian Buffer Preserved	0.02	0.01	0.00	0.01
Alluvial Floodplain Upland Buffer Preserved	0.32	0.13	0.00	0.13
Ephemeral Stream	2.61	1.04	0.50	0.54
Ephemeral Stream Preserved	0.32	0.13	0.13	0.00
Ephemeral Stream Riparian Buffer Preserved	2.05	0.82	0.53	0.29
Ephemeral Stream Upland Buffer Preserved	36.26	14.51	0.00	14.51
Freshwater Marsh	0.42	0.17	0.04	0.13
Freshwater Marsh Upland Buffer Preserved	2.12	0.85	0.00	0.85
Open Water	1.73	0.69	0.08	0.61
Open Water Preserved	1.24	0.49	0.00	0.49
Open Water Riparian Buffer Preserved	0.23	0.09	0.02	0.08
Open Water Upland Buffer Preserved	5.31	2.13	0.00	2.13
Seasonal Wetland	35.89	14.36	10.70	3.65
Seasonal Wetland Preserved	1.29	0.51	0.00	0.51
Seasonal Wetland Riparian Buffer Preserved	14.56	5.83	0.34	5.48
Seasonal Wetland Upland Buffer Preserved	264.51	105.80	20.13	85.68
Wetland Riparian	9.09	3.64	3.32	0.31
Wetland Riparian Riparian Buffer Preserved	4.78	1.91	0.13	1.78
Wetland Riparian Upland Buffer Preserved	142.17	56.87	19.88	36.99
Grand Total	554.75	225.63	59.90	165.73

On Wed, Sep 9, 2020 at 4:12 PM Pankratz, Shannon L CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil> wrote:

CLASSIFICATION: UNCLASSIFIED

Hi Nate and Marlene,

The IRT had met to go over credit ledgers and the tracking of bank information over time. And out of that we have the below requests/questions:

Credit Release Request Tables
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-Add Phase
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-Include in your cover letter the number of credits that are being deducted from each credit category with a detailed accounting of any credits that are deducted from multiple credit categories.
-Provide all documents that have or will be been updated as a result of the credit sale or approval of credit release including the credit tables, ledgers and master spreadsheet

Coordination
-Schedule a meeting in coordination with IRT review of Annual Report to review/reconcile credit balances /accounting and annual report

-Please send all credit sale notifications to all IRT members as well as to RIBITS.

We can discuss these items with you if anything is unclear, and it may be a good idea to schedule a time that we can go through another IRT ledger walk-through as we had done some time ago.

Thanks,

Shannon Pankratz
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IMPORTANT NOTE: During the Coronavirus Health Emergency, Regulatory Program staff are teleworking. Please do not mail hard copy documents to any Regulatory staff or office. For further details on corresponding with us, please view our COVID-19 special public notice at:
https://www.spl.usace.army.mil/Portals/17/docs/publicnotices/COVID19%20Regulatory_SPN.pdf?ver=2020-03-19-134532-833

Assist us in better serving you! Please complete our brief customer survey, located at the following link: http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey

CLASSIFICATION: UNCLASSIFIED

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Our San Diego office has moved! Please note our new address.